

REMARKS

The present application has been carefully studied and amended in view of the outstanding Office Action dated November 14, 2006, and reconsideration of that Action is requested in view of the following comments.

A petition for a one-month extension of time accompanies this response together with the appropriate fee. Accordingly, the deadline for responding to the Office Action has been extended until March 14, 2007, and this response is therefore timely filed since it was deposited in the mail for First Class Delivery Service on the date certified on the front page hereof. The present owner of the subject application is a small entity and therefore entitled to reduced fees. Accordingly, the fee for the requested one month extension is \$60.00.

Applicant respectfully submits that claims 1, 3-5 and 10-17 define a security card which is neither shown nor suggested by the prior art taken alone or in combination with one another. Specifically, these claims are not rendered obvious by Haghiri et al. US 5,888,624 ("Haghiri") and Ludwig et al. US 2002/0022143 ("Ludwig"), for the following reasons.

In the outstanding Office Action, paragraph four rejects claims 1-5 and 10-18 as unpatentable over the combination of Haghiri and Ludwig, but portions of the explanation refer to Shimada which is not specifically applied in the rejection. However, the following comments are directed to the Haghiri/Ludwig combination, and the claims are believed to distinguish over that combination.

Claims 2 and 18 have been canceled and the subject matter of dependent claim 18 is now incorporated in claim 1. Hence, claim 1, as amended, does not present any

new issues for consideration by the Examiner at this stage of the prosecution since the subject matter of claim 18 was previously searched and considered.

Contrary to the Examiner's position, applicant respectfully submits that a person skilled in the art would not learn from Haghiri to produce a card with a paper-core and a chip located therein, and to cover the chip on both sides with a metal or plastics seal on one side and a plastics layer on the other side as presently claimed. To the contrary, it is specifically disclosed at column 5, lines 25+ of Haghiri, that the card bodies should be exclusively of paper and cardboard and not from plastics, and it is clear from this passage, that the card bodies according to Figures 7 and 8 consist of a paper core and the paper cover layers 5 and 9, that are glued together by the adhesive layers 11 that are thermally activated. Therefore a person skilled in the art would learn from Haghiri, that the cover layers should also be of paper, and that Haghiri is discussing the gluing of paper layers when speaking of lamination in the context of the invention. The silicon band cited by the Examiner is described by Haghiri only as a carrier of the adhesive, and is not incorporated in the card assembly. Haghiri refers to the lamination of plastics layers only when referring to the prior art (e.g. at column 1, lines 10+, cited by the Examiner) that describes cards completely made of plastics and having the disadvantages disclosed by Haghiri and also mentioned as a disadvantage in the present specification (e.g. unpleasant stiffness according to specification page 1, line 25).

Therefore it would not be obvious for a person skilled in the art when taking into regard the teaching of Haghiri, to produce a chip card with a paper core and plastics or metal materials that cover the chip on both sides. This provides the additional feature of

strong adhesion of the plastics or metal seal to the paper core of the card that does not allow removal of the seal without tearing apart the paper core.

The same holds true for Haghiri in view of Ludwig, as a person skilled in the art who wants to improve the anti-counterfeiting properties of the cards disclosed by Haghiri, would find no appropriate means for this objective in Ludwig. The invention of Ludwig, to the extend that it is related to chip cards, is used to temporarily and detachably fix the complete chip card to a backing, see e.g. paragraphs [0001], [0002] and [0019]. Accordingly to paragraph [0005], the information carriers, e.g. the chip card, must be **detachable in a manner that is guaranteed not to cause damage**. This teaching is completely opposed to the present invention, as the stronger adhesion between the seal and paper core compared to the cohesion within the paper core and/or the adhesion between the layers of the paper core as presently claimed, will inevitably destroy the paper core, if someone attempts to remove the seal.

Claims 6-8 also stand rejected under the same combination of Haghiri and Ludwig and further in view of Fraser et al. US 4,855,583 ("Fraser"). Specifically, the combination of Haghiri and Ludwig fails to teach imagine-forming layer comprising a photographic layer. Fraser is relied upon for this feature, but Fraser does not address the fundamental deficiencies of Haghiri and Ludwig as discussed above. Accordingly, claims 6-8 are believed to be directed to allowable subject matter for the same reasons discussed above concerning claim 1 from which claims 6, 7 and 8 depend either directly or indirectly.

In the present invention the combination of features as presently claimed results in an outstanding anti-counterfeiting security, and neither Haghiri alone nor in

combination with Ludwig would have given a person skilled in the art any hint or suggestion to try this combination. Instead the prior art teaches away from the present invention for the reasons discussed above.

Accordingly, for the reasons discussed above it is believed that the present application is in condition for allowance and early notification to that effect is respectfully requested.

Respectfully submitted,

By Richard M. Beck

Richard M. Beck

Registration No.: 22,580

CONNOLLY BOVE LODGE & HUTZ LLP

1007 North Orange Street

P.O. Box 2207

Wilmington, Delaware 19899

(302) 658-9141

(302) 658-5614 (Fax)

Attorney for Applicant

526800